



West World Management, Inc.

March 14, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Room 222
Washington, DC 20554

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RE: CS Docket no 95-184; Telecommunications Services, inside wiring

Dear Mr. Caton,

On behalf of my employer and the two commercial office buildings I manage I am writing in response to the FCC's Notice of Proposed Rulemaking regarding telephone and cable wiring inside buildings. I am enclosing four copies of this letter together with this original.

West World Holdings, Inc. is concerned that any action by the FCC regarding telecommunications services' access to our private property may inadvertently adversely affect the conduct of our business, the security of our property and the relations that we have with our tenants.

I manage two properties in New York City comprising almost a million square feet with more than a hundred and twenty tenants. The number one issue of concern raised by your proposed regulations is the issue of security within and about the properties I manage; the security of the property itself when exposed to access by persons and firms with whom I have no direct or contractual control over; the security of the services delivered within the property when those service-systems are accessible by fiercely competitive third-party firms and individuals; and the security of the tenants' right to "quiet enjoyment" when those same competitors are then inside the building hawking their services (or even sabotaging others' services?); and the security of the building's other essential mechanical systems which do now already occupy the precious little spaces available when then telecommunications firms individuals would access our essential systems' spaces.

As the Building Owner and Manager we must keep and defend our right to control every activity and every service which is delivered within our buildings without undue interference or imposition by the government. The circumstances of any one building are so very different from the circumstances of the next building, that only the building's Owner and Manager can recognize the special needs of the building, its tenants, and the services delivered to it. Situated in different time zones, administrative districts, regulatory jurisdictions, and occupied with different kinds of tenants, different kinds of businesses, different

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criterion for operations, and different emphasis there is no conceivable plan that could make a single determination justly applicable to so broad a spectrum of commercial properties.

Inre A Common Demarcation Point for incoming telecommunications services: The very nature of each individual property should determine the criterion for the location of the demarcation point and not an arbitrary determination made on paper in a remote office of some government agency. In one of my buildings there is a single vault on the ground floor which is entirely adequate to the purpose, in the other building there are several vaults situated throughout the building; the different needs and the different configurations of the two buildings cannot be summarized in a single consideration.

Inre A Standard for Connections and Connecting devices: The telecommunications industry itself has established communications standards which are under constant review and subject to timely changes such as are made necessary by the continuing advances made in technology. Any new generation of technology that is at once constrained to the cumbersome aging-standards written into some administrative law is also constrained from achieving the higher order of performance which is its objective. No agency of any government is better equipped to establish those standards than the free-market system that works today; That system has allowed the industry to advance through copper-pairs capable of handling a single "phone call" to multi-plexing and to fibre-optics now capable of handling thousands of calls simultaneously.

Inre Regulation of Wiring; As above stated I do not believe that the government can effectively write a code so broad as to best serve the myriad of buildings and their unique circumstances, and so finite as to achieve the stated goals. Again, it is the market place, the inventors and designers, the servicers and the providers, and the owners, managers and users who, by the unfettered practice of their enterprises, are best able to define - by use - the best scheme and the best kind and the best type of wiring to carry their demands. And, again, not a bureaucrat or a committee of bureaucrats at a desk in an office of some agency or another.

In conclusion, on behalf of West World Management, Inc. I urge the FCC to desist from any endeavor to regulate telecommunications services delivered to or within commercial properties and to allow America's technology industries to continue doing what only they can best do in a free market: Invent, Innovate, Enterprise, Compete, and Succeed (or Fail) on their own merit.

Sincerely Yours,



Jim Doty
Property Manager
West World Management, Inc.
20 Exchange Place 2nd Floor
New York City, New York 10005